

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

NHC LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 2019 C 6332
	)	
CENTAUR CONSTRUCTION COMPANY, <i>et al.</i> ,	)	Judge Matthew Kennelly
	)	
Defendants.	)	

**PLAINTIFF/JUDGMENT CREDITOR’S STATEMENT REGARDING ADDITIONAL  
AMOUNTS DETAILED IN US BANK RECORDS**

By its Order entered May 30, 2025 (Dkt. No. 682), the Court directed Plaintiff/Judgment Creditor NHC LLC (“NHC”) to “submit to the Court [. . .] what additional amounts detailed in the US Bank records have been impermissibly transferred or dissipated that have not already been addressed in prior contempt rulings.” (*Id.* at 10.) In compliance with the Court’s Order, NHC states that it has identified the following transfers or dissipation of funds from US Bank accounts owned or controlled by judgment debtors Spiro Tsaparas (“Tsaparas”) and held in the name of Tsaparas, Centaur Construction Co., or Triton Marine Holdings LLC occurring after May of 2023 which have not been addressed in prior contempt rulings:

Account Number	Month	Funds Transferred/Dissipated
5923	6/2023	\$0
5923	7/2023	\$0
5923	8/2023	\$0
5923	9/2023	\$3,500.00
5923	10/2023	\$0
5923	11/2023	\$0
5923	12/2023	\$0
5923	1/2024	\$0
5923	2/2024	\$0
5923	3/2024	\$0
5923	4/2024	\$0
5923	5/2024	\$0

5923	6/2024	\$0
5923	7/2024	\$3.34
5923	8/2024	\$0
5923	9/2024	\$29.95
5923	10/2024	\$38.95
5923	11/2024	\$0
<b>Total</b>	<b>6/2023 – 11/2024</b>	<b>\$3,572.24</b>

Account Number	Month	Funds Transferred/Dissipated
1745	11/2023	\$0
1745	12/2023	\$100
<b>Total</b>	<b>12/2023</b>	<b>\$100</b>

Account Number	Month	Funds Transferred/Dissipated
3011 <sup>1</sup>	6/2023	\$8,936.00
3011	7/2023	\$12,736.00
3011	8/2023	\$12,656.00
3011	9/2023	\$12,692.00
3011	10/2023	\$22,135.00
3011	11/2023	\$44,415.26
<b>Total</b>	<b>6/2023 – 11/2023</b>	<b>\$113,570.26</b>

Account Number	Month	Funds Transferred/Dissipated
8746	6/2023	\$4,051.46
8746	1/2024	\$28.95
8746	2/2024	\$29.95
8746	3/2024	\$29.95
8746	4/2024	\$29.95
8746	5/2024	\$29.95
8746	6/2024	\$29.95
8746	7/2024	\$29.95
8746	8/2024	\$29.95
8746	9/2024	\$0
<b>Total</b>	<b>6/2023; 1/2024 – 9/2024</b>	<b>\$4,290.06</b>

Account Number	Month	Funds Transferred/Dissipated
8753	2/2024	\$45,485.49
8753	3/2024	\$28,030.32
8753	4/2024	\$54,711.85
8753	5/2024	\$33,170.12
8753	6/2024	\$39,082.12

<sup>1</sup> US Bank account number ending in 3011 is the subject of another pending motion for rule to show cause regarding transfers made through Triton Marine Holding, LLC. (Dkt. No. 647.) As the Court has not yet ruled on that motion, Account 3011 is included for completeness.

8753	7/2024	\$29,473.75
8753	8/2024	\$4,849.72
8753	9/2024	\$12,811.61
8753	10/2024	\$2,277.71
8753	11/2024	\$1,828.33
8753	12/2024	\$3,390.53
8753	1/2025	\$2,489.51
<b>Gross Total</b>	<b>1/2024 – 1/2025</b>	<b>\$257,601.06</b>
<b>Less Cash Transfers addressed in Dkt. No. 592- 12</b>	<b>1/2024 – 9/2024; 12/2024</b>	<b>\$91,921.50</b>
<b>Net Total</b>		<b>\$165,679.56</b>

Account Number	Funds Transferred/Dissipated
5923	\$3,572.24
1745	\$100
3011	\$113,570.26
8746	\$4,290.06
8753	\$165,679.56
<b>Total</b>	<b>\$287,212.12</b>

The additional amounts transferred or dissipated from the US Bank accounts detailed above are an accurate reflection of the amounts described in the US Bank records NHC has received from the Judgment Debtors to date. NHC may petition the Court for additional relief concerning any amounts impermissibly transferred or dissipated described in other US Bank records (or bank records from other banking institutions) which have not yet been provided to NHC, including impermissible transfers or dissipations occurring in the future. NHC will supply the Court with the US Bank records supporting the transfers/dissipations detailed in this Statement upon request.

Dated: June 6, 2025

Respectfully submitted,

NHC LLC

By: /s/ Zachary J. Watters  
One of Its Attorneys

Daniel P. Jackson, Bar No. 6289813  
Bryan K. Clark, Bar No. 6296090  
Zachary J. Watters, Bar No. 6310675  
Allison E. Czerniak, Bar No. 6319273  
Keeley A. Sawyer, Bar No. 6336704  
Vedder Price P.C.  
222 North LaSalle Street  
Chicago, Illinois 60601  
T: +1 312 609 7500  
djackson@vedderprice.com  
bclark@vedderprice.com  
zwatters@vedderprice.com  
aczerniak@vedderprice.com  
ksawyer@vedderprice.com

Gini S. Marziani, Bar No. 3127421  
Davis McGrath LLC  
125 S. Wacker Drive  
Chicago, Illinois 60606  
T: +1 312 332 3033  
gsmarziani@davismcgrath.com

**CERTIFICATE OF SERVICE**

I hereby certify that, on June 6, 2025, a true and correct copy of the foregoing **PLAINTIFF/JUDGMENT CREDITOR'S STATEMENT REGARDING ADDITIONAL AMOUNTS DETAILED IN US BANK RECORDS** was electronically filed with the Clerk of the Court using the Court's CM/ECF system and thereby served electronically by the CM/ECF system on all counsel of record.

/s/ Zachary J. Watters

An Attorney for NHC LLC